

June 28, 2018

submitted via electronic mail to:
AlisoCanyonOII@cpuc.ca.gov

California Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, CA 94102

Re: Comments on the *Update to the Scenarios Framework: I.17-02-002*

Dear Energy Division Staff:

Per the Administrative Law Judge's Ruling Requesting Informal Feedback on Energy Division's Updated Proposed Phase 1 Scenarios of June 15, 2018, please accept this document as my feedback and comments in my capacity as a party to the proceeding.

In my July 24, 2017, comments on ALJ's ruling of June 26, 2017, I raised the concern that the hydraulic modeling effort is focused exclusively on the gas conveyance and delivery system as it is currently configured (page 7, bullet 4). The question of "*whether the use of Aliso Canyon can be minimized or eliminated*" is not answered by only looking at the current system. The question is only answered by also looking at what the system should look like for it to operate without Aliso Canyon. Yet, it appears that the hydraulic model will continue to model the system ONLY in its current configuration. This is apparent in the linear approach for the entire modeling effort as shown in Figure 1 of the June 15 update. I urge the Energy Division to recognize that the question of feasibility of eliminating the use of Aliso Canyon must be an iterative process that identifies the constraints and then determines if and how those constraints can be modified to remove their effects. These constraints may be supply related, demand related, or conveyance related. Whatever they are, the question will be what constraints would need to be removed, and at what cost, to allow for the elimination of Aliso Canyon. Without this component of the analysis, the question of feasibility of minimizing or eliminating the use of Aliso Canyon will not be answered.

Furthermore, in my comments on ALJ's ruling of April 4, 2018, I, along with several other parties, urged the ALJ not to utilize Southern California Gas Company (SoCalGas) for conducting the hydraulic modeling. However, that decision appears to remain unchanged. This task is the foundation of all the conclusions of this proceeding and having SoCalGas conduct this task is in gross conflict with the intent of SB 380 which initiated this proceeding. It is inconceivable to me that the one party that is the primary focus of this proceeding will be given the task of using their internal black-box model to determine the fate of the entire proceeding. The CPUC may very well save its money and go straight to the end of the proceeding by declaring that the use of Aliso Canyon cannot be minimized or eliminated. I repeat my strong objection to the use of any SoCalGas

personnel or resources for conducting any task in this proceeding, especially the hydraulic modeling.

Finally, I would like to note that the parties are being given less and less time to review and comment on proceeding rulings and documents. A period of only 13 days is grossly insufficient to review and comment on this critical document. I urge the ALJ to provide more time for a more meaningful review.

Respectfully,

A handwritten signature in black ink, appearing to read "Issam Najm". The signature is fluid and cursive, with the first name "Issam" and last name "Najm" clearly distinguishable.

Issam Najm, Ph.D.
Resident
Porter Ranch, California